

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,
AND IRBESARTAN PRODUCTS
LIABILITY LITIGATION**

This Document Relates to All Actions

MDL No. 2875

Honorable Robert B. Kugler,
District Court Judge

**CERTIFICATION OF
JESSICA DAVIDSON, ESQ.**

JESSICA DAVIDSON, ESQ., being of full age, certifies as follows:

1. I am a Partner at Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC. I make this Certification based on personal knowledge and in support of Defendants' Motion to Exclude the Opinions of Laura Plunkett, Ph.D.
2. Attached hereto as Exhibit 1 is a true and accurate copy of the Report of Laura M. Plunkett, dated October 31, 2022, served in MDL 2875.
3. Attached hereto as Exhibit 2 is a true and accurate copy of the transcript of the deposition of Laura M. Plunkett, in MDL 2875, dated January 12, 2023.
4. Attached hereto as Exhibit 3 is a true and accurate copy of the Tentative Ruling Permitting Dr. Plunkett's Opinions in Part in *Lloyd v. Johnson & Johnson* (*Pl. Eva Echeverria only*), No. BC628228 (JCCP No. 4872) (Cal. Super. Ct.).

5. Attached hereto as Exhibit 4 is a true and accurate copy of the transcript of the deposition of Laura M. Plunkett, in MDL 2875, dated February 10, 2023.

Respectfully submitted,

/s/ Jessica Davidson

Jessica Davidson (DC Bar No. 457021)
(Admitted to Practice in Maryland and the
District of Columbia; Not Admitted in New
York)

*Liaison Counsel for Manufacturer
Defendants*

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Dated: March 13, 2023